

March 18, 2016



To: Federal Communications Commission
Washington, DC 20554

Re: AM Improvement

Dear Commissioners and Staff:

The FCC has asked for comments on a number of subjects related to AM Broadcasters. I applaud the decision to make it possible for AM Broadcasters to add an FM translator to their facility. Most AM broadcasters are providing a needed public/community service, but are challenged by local business conditions. Local business owners generally do not believe that the public listens to AM and are therefore reluctant to advertise (a broadcaster's only source of income) with an AM station. The public does listen to AM less and less (as local businesses rightfully believe). Thus, having an FM translator for AM gives the opportunity to serve/have more listeners and there is a greater willingness for local business people to be supportive. I can attest to the fact that having an FM translator brings a heritage AM's programming back to community importance.

While it took a while for the FCC to grant a process for AM stations to earn an FM translator, Commissioner Clyburn noted on March 15 that the FCC staff has acted quickly on granting applications. FCC staffers Mr. Jim Bradshaw and Mr. Rob Gates deserve a lot of credit and thanks for that fast action as do the Commissioners (especially Commissioners Clyburn and Pai) for supporting and authorizing it.

While I am not an engineer, I would like to comment on three items and recommend:

- 1) NIGHTTIME SKYWAVE PROTECTION: It is in the public's best interest that for times of emergency to be able to depend on the nighttime service of 50,000 watt "clear channel" and high power "regional" AM stations. I would urge that this skywave protection be guarded and protected. At the same time, it is not inappropriate to encourage these stations to re-think some of their "paid" overnight programming.
- 2) DAYTIME AM POWER: Daytime AM power should be allowed to increase. Over the years the FCC has allowed the "noise level" of AM interference to increase. While years ago it was possible to listen to the 1mv/m and .5 mv/m contour of an AM station, that is not longer true. Thus the FCC should allow AM stations to increase their daytime (and pre-sunrise/post sunset) power to accommodate and off-set for that increased noise level that has degraded the

service of each and every AM station in the country. Many small market and minority owned stations are in this group that have been disadvantaged by the increasing noise/interference from appliances, power lines, lighting, etc that has made the stations unlistenable.

- 3) TRANSLATOR PLACEMENT: If the daytime power increase is reasonable, then it is reasonable to increase the distance (up to 40 miles coverage) for the placement of FM translators associated with AM stations.

If you have any questions, please feel free to contact me.

Bud



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